

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

2016 MAR 31 PM 12:50

)  
) U.S. DISTRICT COURT  
) DISTRICT OF MASSACHUSETTS  
) MDL No. 2419.  
) Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

All Cases

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**NOTICE OF FILING MANUALLY EXHIBITS 1, 2, 3, AND 4 TO DOCUMENT #2766  
TENNESSEE CLINIC DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF  
THEIR MOTION TO COMPEL COMPLETION OF THE DEPOSITION OF DAVID  
KESSLER, MD WITH AN ORDER MANDATING DIRECT RESPONSES**

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Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN, CNOR; Vaughan Allen, MD ("Tennessee Clinic Defendants") give notice to the Court and to all parties of the manual filing of the following exhibits to Document #2766, Tennessee Clinic Defendants' Memorandum Of Law In Support Of Their Motion To Compel Completion Of The Deposition Of David Kessler, MD With An Order Mandating Direct Responses:

1. Exhibit 1 – 37 minute highlight video from the deposition of David Kessler, MD taken March 4, 2016;
2. Exhibit 2 – Videotaped deposition of David Kessler, MD taken March 4, 2016, part 1 of 3;
3. Exhibit 3 – Videotaped deposition of David Kessler, MD taken March 4, 2016, part 2 of 3; and,

4. Exhibit 4 – Videotaped deposition of David Kessler, MD taken March 4, 2016, part 3 of 3.

Respectfully submitted,

**GIDEON, COOPER & ESSARY, PLC**

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\* Admitted pursuant to MDL Order No. 1.

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed manually with the Clerk's office will be served via regular U.S. mail this 30<sup>th</sup> day of March, 2016.

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